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BRIAN J. CALLAGHAN

EDWARD M. THOMPSON

WILLIAM A. THOMPSON, III

June 7, 2006

Bankruptcy Court Clerk
P.O. Box 2067
Camden, NJ 08101-2067

Re: **William Pitts**
Case #06-12772JHW

Dear Sirs:

Please enter my objection to the motion to reinstate the Chapter 13 case of the above presently scheduled for June 14, 2006. This objection is entered on behalf of creditor Li Yun Ou the landlord of the debtor. The debtor William Pitts has not paid the monthly rent since January of 2006 and if the case had proceeded on a normal course a motion to lift the automatic stay would already have been filed. Because of the dismissal of the case a new eviction suit has been filed and is presently schedule for June 9, 2006. This debtor should not be permitted to take advantage of the delay in their attorney's receipt of the counseling certificate to the detriment of the landlord. If the case is reinstated then we would ask that the stay not be reimposed upon the landlord Li Yun Ou and she be permitted to proceed with the eviction complaint. In the alternative the debtor should be required to pay the post petition rent of \$1,800.00 representing the monthly rent for May and June since as I indicated a motion to lift the automatic stay would already have been filed if the landlord had not been prejudiced by the prior dismissal of this case.

Thank you for your consideration.

Very Truly Yours,

Callaghan Thompson & Thompson, P.A.

By: 

William A. Thompson, III

WAT/mp

cc: Isabel C. Balboa, Trustee
Stewart H. West, Esq.